

August 10, 2016

The Honorable Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WV Docket No. 16-143, Business Data Services in an Internet Protocol Environment; WC Docket No. 15-247, Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans; WC Docket No. 05-25, Special Access for Price Cap Local Exchange Carriers; RM-10593, AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services.

Dear Chairman Wheeler:

The undersigned organizations represent a cross-section of rural Americans. Our members respectfully request you reconsider your proposed rule for regulation of the business data services market.

It is well known that over the past several years there have been billions of dollars invested in networks of fiber infrastructure that have allowed business, small and large, rural and urban, to connect to the internet at high speeds, thus increasing productivity and sales. These private-public partnerships are true success stories. Unfortunately, much of rural America remains caught in the digital divide, as rural areas remain the last regions to receive widespread broadband, lagging far behind the urban cores.

We are concerned that this proposal would discourage needed investment in the broadband marketplace. If this proposal moves forward, our understanding is it could force cuts in the millions of dollars in future investment. Investment that is crucial to rural communities, because farmers, ranchers, rural businesses and major companies alike depend on quality high-speed internet access.

Without significant investment in broadband, economic development and job creation will be significantly hindered. Plus, the additional commerce, services and endless opportunities afforded by quality high-speed internet access will also be lost.

The FCC proposal purports to increase competition, yet there is a miscalculation regarding the level of competition within the current high-speed internet marketplace. Upon review and consultation with industry leaders, it is our understanding that the analysis relies upon outdated data that underestimates cable providers' ability to provide competition for special access services. In fact, several major cable providers recently filed updated data with the FCC that more accurately reflects competition in the business broadband market. This data proves that cable's footprint is substantially greater than what the FCC is currently using in its analysis.

Rural residents were pleased in 2011 when the Obama Administration established the White House Rural Council. This council was created with a commitment to promoting and coordinating private-sector partnerships. One of the key objectives within the Council is to increase expansion of telecommunications. Private, public partnerships are essential to expanding high-speed internet access, yet this proposed rule takes a step backwards and will negatively impact needed investment and future work.

In closing, the following groups urge you to review the merits of this rule and closely examine the underlying data and overall goal at hand. We must avoid imposing a regulation that will undermine rural America's access to high-speed broadband.

Sincerely,

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